

Statement of Basis of the Federal Operating Permit

Union Carbide Corporation

Site/Area Name: Organic Acids Facilities

Physical location: 3301 5th Ave S

Nearest City: Texas City

County: Galveston

Permit Number: O1923

Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2869

SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: June 10, 2015

Operating Permit Basis of Determination

Permit Area Process Description

Building 24 Acids Facilities

The Building 24 Acids Facilities produce organic acid products from aldehyde feedstocks. The oxidation and subsequent refinement of propionaldehyde, valeraldehyde, 2-methylbutyraldehyde, and 2-ethylhexaldehyde produces the respective acid products: propionic acid, valeric acid, 2-methylbutyric acid, and 2-ethylhexanoic acid. The Building 24 Acids Facilities operations can be divided into the following systems: feed and reaction; refining, product recovery, and storage; and emission controls.

Feed and Reaction: Aldehyde feed is fed to the reaction block where the aldehydes are oxidized to crude acid. Vent gases are sent to a control device.

Refining, Product Recovery, and Storage: Crude acid is refined by fractional distillation to remove unwanted impurities. Refined acid and by-products are sent to storage. All gaseous vents from refining and storage processes are sent to a control device. Aqueous streams are sent to the plant dilute wastewater system. Existing IPD storage tanks are used as field storage tanks for the acid products. The field storage tanks are included in the In-Plant Distribution application and are therefore not addressed as part of the Organic Acids facilities application.

Emission Controls: The organic acids incinerator is used for the destruction of organics contained in the collected vent streams from the Building 24 Acids Facilities. Vents in the Building 24 Acids Facilities routed to the incinerator include those from the reaction block, refining system, storage vessels, feed pots, and seal pots. The incinerator operates at a minimum temperature of 1300°F. Fuel gas is added to the incinerator chamber, as necessary, to maintain the correct temperature. The OAI destruct device is used as a backup to the incinerator.

Organic Acids II (OAI) Unit

OAI produces organic acid products from aldehyde feedstocks. The OAI unit does not produce any HON listed chemical and is thus not subject to 40 CFR 63 Subparts F, G, and H. The OAI operations can be divided into the following systems: feed, reaction, refining, storage, and emission controls.

Feed: Aldehyde feed stocks are pumped to the Reaction Block.

Reaction: Aldehyde is oxidized in the reaction block. Gaseous vents are sent to a control device. Crude product is sent to the refining block.

Refining: Crude acid is refined by fractional distillation. Liquid product from refining is then pumped to Unit Make Tanks or to In-Plant Distribution (IPD) storage vessels.

Storage: The By-product and Unit Make Tanks are new fixed roof tanks that are maintained under positive pressure with a blanket gas and vented to the flare. Off-spec product and by-product acid stored in these tanks are either reprocessed or combusted. Existing IPD storage tanks are used as field storage tanks for the acid products. The field storage tanks are included in the In-Plant Distribution application and are therefore not addressed as part of the Organic Acids facilities application.

Emission Controls: The OAI Flare is used for the destruction of organics contained in the collected vent streams from the OAI Unit. Vents in the OAI Unit routed to the flare header include those from the reaction block, refining block storage vessels, feed pots, and seal pots. Additionally, the flare is the primary control device for the Oxidation Pilot Unit reactor vent. The flare also serves as a backup to the Building 24 Acids Incinerator during non-routine operations. Fuel gas is added to the flare stream, as necessary, to maintain a minimum heating value of 200 BTU/scf as required for non-assisted flares. A pilot light, which is monitored And equipped with an alarm, provides a continuous ignition source.

FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O1433, O1913, O1914, O1916, O1917, O1919, O1920, O1921, O1924

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO ₂ , PM, NO _x , HAPs, CO
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Reading State of Texas’s Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield

- New Source Review Authorization References
- Compliance Plan
- Alternative Requirements
- Appendix A
 - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements

(exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed either before or after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that

cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled “Basis of Determination.” Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column “Changes and Exceptions to RRT.” If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word “None” will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled “Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected.”

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled “Basis for Applying Permit Shields” specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-OAII TK	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
GRP-OAII TK	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>
T12C3005	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
T12C3005	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
T12C3005	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
T12C3102	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>

Unit ID	Regulation	Index Number	Basis of Determination*
T12C3102	30 TAC Chapter 115, Storage of VOCs	R5112-02	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Flare</p>
T12C3102	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
T12C3102	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
T12C3301	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
T12C3301	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p>
T12C3301	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
T12C3302	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
T12C3302	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p>

Unit ID	Regulation	Index Number	Basis of Determination*
T12C3302	40 CFR Part 63, Subpart G	63G-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
T12C3304	30 TAC Chapter 115, Storage of VOCs	R5112-01	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons
T12C3304	40 CFR Part 63, Subpart G	63G-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
T12C3306	30 TAC Chapter 115, Storage of VOCs	R5112-01	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
T12C3306	40 CFR Part 60, Subpart Kb	60Kb-01	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
T12C3306	40 CFR Part 63, Subpart G	63G-1	MACT Subpart F/G Applicability = The unit is a Group 2 vessel. NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y. NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.
T12C3307	30 TAC Chapter 115, Storage of VOCs	R5112-01	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Control Device Type = Direct-flame incinerator

Unit ID	Regulation	Index Number	Basis of Determination*
T12C3307	30 TAC Chapter 115, Storage of VOCs	R5112-02	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Flare</p>
T12C3307	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 4.0 psia but less than 11.1 psia</p>
T12C3307	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
T12C3309	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>
T12C3309	30 TAC Chapter 115, Storage of VOCs	R5112-02	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Flare</p>
T12C3309	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
T12C3309	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
T12C3401	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
T12C3401	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p>
T12C3401	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
T12C3402	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
T12C3402	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p>
T12C3402	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
T12C8901	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons</p>
T12C8901	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
T12C8902	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons</p>
T12C8902	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
T12C8903	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons</p>
T12C8903	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
T12C8904	30 TAC Chapter 115, Storage of VOCs	R5112-01	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons</p>
T12C8904	40 CFR Part 60, Subpart Kb	60Kb-01	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>
T12C8904	40 CFR Part 63, Subpart G	63G-1	<p>MACT Subpart F/G Applicability = The unit is a Group 2 vessel.</p> <p>NESHAP Subpart Y Applicability = The unit is not subject to 40 CFR Part 61, Subpart Y.</p> <p>NSPS Subpart Kb Applicability = The unit is not subject to 40 CFR Part 60, Subpart Kb.</p>
E12C050	30 TAC Chapter 111, Visible Emissions	R1111-01	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
E12C050	40 CFR Part 60, Subpart A	60A-01	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4).</p> <p>Flare Assist Type = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
E12C050	40 CFR Part 63, Subpart A	63A-01	<p>Required Under 40 CFR Part 63 = Flare is required by a Subpart under 40 CFR Part 63.</p> <p>Heat Content Specification = Adhering to the heat content specifications in 40 CFR § 63.11(b)(6)(ii) and the maximum tip velocity specifications in 40 CFR § 63.11(b)(7) or 40 CFR § 63.11(b)(8).</p> <p>Flare Assist Type = Non-assisted</p> <p>Flare Exit Velocity = Flare exit velocity is less than 60 ft/s (18.3 m/sec)</p>
F12C001-01	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352-01	<p>Agitators = The fugitive unit does not contain agitators.</p> <p>Compressor Seals = The fugitive unit contains compressor seals.</p> <p>Flanges = The fugitive unit contains flanges.</p> <p>Open-ended Valves = The fugitive unit does not contain open-ended valves.</p> <p>Pressure Relief Valves = The fugitive unit contains pressure relief valves.</p> <p>Process Drains = The fugitive unit has process drains.</p> <p>Pump Seals = The fugitive unit contains pump seals.</p> <p>Rupture Disks = The fugitive unit has pressure relief valves equipped with rupture disks.</p> <p>Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10.</p> <p>Valves (other than pressure relief and open-ended) = The fugitive unit contains valves other than pressure relief valves or open-ended valves or lines.</p> <p>Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method for demonstrating and documenting continuous compliance with an alternate control requirement or exemption criteria for process drains or no alternate has been requested.</p> <p>Instrumentation Systems = The fugitive unit has instrumentation systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.</p> <p>Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.</p> <p>Sampling Connection Systems = The fugitive unit does not have sampling connection systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.</p> <p>Weight Percent VOC = All components contact a process fluid that contains greater than or equal to 10% VOC by weight.</p> <p>50% by Volume = Compressors are not in hydrogen service or are in hydrogen service and the hydrogen content cannot be reasonably expected to always exceed 50% by volume.</p> <p>Complying with § 115.352(1) = Valves are complying with § 115.352(1).</p> <p>Complying With § 115.352(1) = Pressure relief valves are complying with § 115.352(1).</p> <p>Complying with 30 TAC § 115.352(1) = Flanges are complying with the requirements in 30 TAC § 115.352(1).</p> <p>Reciprocating Compressors Or Positive Displacement Pumps = The fugitive unit does not have reciprocating compressors or positive displacement pumps used in natural gas/gasoline processing operations.</p> <p>Shaft Seal System = Pump seals are not equipped with a shaft seal system that prevents or detects emission of VOC from the seal.</p> <p>TVP 0.002 PSIA or Less = The fugitive unit does not have components or systems that contact a process fluid containing VOC having a true vapor pressure less than or equal to 0.002 psia at 68 degrees Fahrenheit.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Shaft Seal System = Compressors are not equipped with a shaft sealing system that prevents or detects emission of VOC from the seal.</p> <p>TVP of Process Fluid VOC <= 0.044 psia at 68° F = No pressure relief valves contact a process fluid with a TVP of less than or equal to 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC <= 0.044 psia at 68° F = Valves contact a process fluid with a TVP less than or equal to 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC <= 0.044 PSIA AT 68° F = Process drains do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.</p> <p>TVP of Process Fluid VOC <= 0.044 PSIA AT 68□° F = Pump seals do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.</p> <p>Complying with 30 TAC § 115.352(1) = Pump seals are complying with the requirements in 30 TAC § 115.352(1).</p> <p>TVP of Process Fluid VOC <= 0.044 PSIA AT 68□° F = Compressor seals do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.</p> <p>TVP of Process Fluid VOC > 0.044 psia at 68° F = Pressure relief valves contact a process fluid with a TVP > 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC > 0.044 PSIA AT 68° F = Flanges contact a process fluid containing VOC having a TVP greater than 0.044 psia at 68 degrees Fahrenheit.</p> <p>Complying With § 115.352(1) = Compressor seals are complying with the requirements in 30 TAC § 115.352(1).</p>
F12C001-01	40 CFR Part 61, Subpart J	61J-01	<p>40 CFR 61 (NESHAP) SUBPART J DESIGN CAPACITY = SITE IS DESIGNED TO PRODUCE OR USE MORE THAN 1,000 MEGAGRAMS OF BENZENE PER YEAR</p> <p>ANY COMPONENT IN BENZENE SERVICE [NESHAP J] = THE FACILITY CONTAINS NO COMPONENT(S) IN BENZENE SERVICE</p>
F12C001-01	40 CFR Part 61, Subpart V	61V-01	<p>Vacuum Service = The fugitive unit contains components in vacuum service.</p> <p>VHAP Service = The fugitive unit contains no components in VHAP service.</p>
F12C001-01	40 CFR Part 63, Subpart H	63H-01	<p>ANY (CLOSED VENT SYSTEMS) = COMPONENT PRESENT</p> <p>ANY (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>BYPASS LINES = FUGITIVE UNIT WITH A CLOSED-VENT SYSTEM DOES NOT CONTAIN A BY-PASS LINE THAT COULD DIVERT A VENT STREAM AWAY FROM THE CONTROL DEVICE AND TO THE ATMOSPHERE</p> <p>ENCLOSED-VENTED PROCESS UNIT AMEL = UNIT DOES NOT CONTAIN A TOTALLY ENCLOSED VENTED PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION IN § 63.179</p> <p>EQUIPMENT TYPE = FUGITIVE UNIT CONTAINS EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>LIGHT LIQUID SERVICE (PUMPS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (AGITATORS) = COMPONENT NOT PRESENT</p> <p>HEAVY LIQUID SERVICE (OPEN-ENDED VALVES OR LINES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (PUMPS) = COMPONENT NOT PRESENT</p> <p>NON RESEARCH AND DEVELOPMENT/BATCH PROCESSES = FUGITIVE UNIT CONTAINS PROCESSES OTHER THAN RESEARCH AND DEVELOPMENT FACILITIES AND BENCH-SCALE BATCH PROCESSES</p> <p>RECOVERY OR RECAPTURE DEVICES (CLOSED VENT SYSTEMS) = COMPONENT NOT PRESENT</p> <p>UNSAFE TO INSPECT = FOR A FUGITIVE UNIT THAT CONTAINS ANY CLOSED-VENT SYSTEM, THERE ARE NO PARTS DESIGNATED AS UNSAFE TO INSPECT</p> <p>ANY (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT</p> <p>BATCH PROCESS AMEL = UNIT DOES NOT CONTAIN A BATCH PROCESS UNIT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>LIMITATION IN § 63.178</p> <p>DIFFICULT TO INSPECT = FUGITIVE UNIT CONTAINS ANY CLOSED-VENT SYSTEM WITH PARTS DESIGNATED AS DIFFICULT TO INSPECT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR PUMPS</p> <p>VACUUM SERVICE = NOT ALL OF THE EQUIPMENT IN THE FUGITIVE UNIT IS IN VACUUM SERVICE</p> <p>ANY (COMPRESSORS) = COMPONENT PRESENT</p> <p>EMPLOYEE NUMBER = THE CORPORATION EMPLOYS 100 OR MORE PERSONS</p> <p>ENCLOSED COMBUSTION DEVICES (CLOSED VENT SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (INSTRUMENTATION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (VALVES) = COMPONENT PRESENT</p> <p>LESS THAN 300 OPERATING HOURS = THE FUGITIVE UNIT DOES NOT CONTAIN ANY EQUIPMENT IN ORGANIC HAZARDOUS AIR POLLUTANT (HAP) SERVICE THAT IS INTENDED TO OPERATE LESS THAN 300 HOURS PER CALENDAR YEAR</p> <p>ANY (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>GAS VAPOR SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>QIP = UNIT DOES NOT OPT TO COMPLY WITH A QUALITY IMPROVEMENT PROGRAM FOR VALVES</p> <p>AMEL = FUGITIVE UNIT SOURCE OWNER/OPERATOR IS NOT ELECTING TO COMPLY WITH AN ALTERNATIVE MEANS OF EMISSION LIMITATION (AMEL)</p> <p>FLARES (CLOSED VENT SYSTEMS) = COMPONENT PRESENT</p> <p>GAS/VAPOR OR LIGHT LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>GENERAL AMEL = UNIT IS NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION UNDER § 63.177</p> <p>HEAVY LIQUID SERVICE (SURGE CONTROL VESSELS OR BOTTOMS RECEIVERS) = COMPONENT NOT PRESENT</p> <p>LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (CONNECTORS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (PRESSURE RELIEF DEVICES) = COMPONENT NOT PRESENT</p> <p>ANY (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>HEAVY LIQUID SERVICE (SAMPLING CONNECTION SYSTEMS) = COMPONENT PRESENT</p> <p>UNITS WITHOUT AMEL = FUGITIVE UNIT EQUIPMENT OR PROCESS UNITS ARE NOT COMPLYING WITH AN ALTERNATE MEANS OF EMISSION LIMITATION.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
F12C05-01	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352-01	<p>Agitators = The fugitive unit does not contain agitators.</p> <p>Compressor Seals = The fugitive unit does not contain compressor seals.</p> <p>Flanges = The fugitive unit contains flanges.</p> <p>Open-ended Valves = The fugitive unit does not contain open-ended valves.</p> <p>Pressure Relief Valves = The fugitive unit contains pressure relief valves.</p> <p>Process Drains = The fugitive unit does not have process drains.</p> <p>Pump Seals = The fugitive unit contains pump seals.</p> <p>Rupture Disks = The fugitive unit has pressure relief valves equipped with rupture disks.</p> <p>Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10.</p> <p>Valves (other than pressure relief and open-ended) = The fugitive unit contains valves other than pressure relief valves or open-ended valves or lines.</p> <p>Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method for demonstrating and documenting continuous compliance with an alternate control requirement or exemption criteria for pump seals or no alternate has been requested.</p> <p>Instrumentation Systems = The fugitive unit has instrumentation systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.</p> <p>Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.</p> <p>Sampling Connection Systems = The fugitive unit does not have sampling connection systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.</p> <p>Weight Percent VOC = All components contact a process fluid that contains greater than or equal to 10% VOC by weight.</p> <p>Complying wIth § 115.352(1) = Valves are complying with § 115.352(1).</p> <p>Complying With § 115.352(1) = Pressure relief valves are complying with § 115.352(1).</p> <p>Complying with 30 TAC § 115.352(1) = Flanges are complying with the requirements in 30 TAC § 115.352(1).</p> <p>Reciprocating Compressors Or Positive Displacement Pumps = The fugitive unit does not have reciprocating compressors or positive displacement pumps used in natural gas/gasoline processing operations.</p> <p>Shaft Seal System = Pump seals are not equipped with a shaft seal system that prevents or detects emission of VOC from the seal.</p> <p>TVP 0.002 PSIA or Less = The fugitive unit does not have components or systems that contact a process fluid containing VOC having a true vapor pressure less than or equal to 0.002 psia at 68 degrees Fahrenheit.</p> <p>TVP of Process Fluid VOC <= 0.044 psia at 68° F = No pressure relief valves contact a process fluid with a TVP of less than or equal to 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC <= 0.044 psia at 68° F = Valves contact a process fluid with a TVP less than or equal to 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC <= 0.044 PSIA AT 68□° F = Pump seals do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.</p> <p>Complying with 30 TAC § 115.352(1) = Pump seals are complying with the requirements in 30 TAC § 115.352(1).</p> <p>TVP of Process Fluid VOC > 0.044 psia at 68° F = Pressure relief valves contact a process fluid with a TVP > 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC > 0.044 PSIA AT 68° F = Flanges contact a process fluid containing VOC having a TVP greater than 0.044 psia at 68 degrees Fahrenheit.</p>
F12C05-01	40 CFR Part 60, Subpart VV	60VV-01	<p>Produces Chemicals = The fugitive unit is not part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
F12C05-01	40 CFR Part 61, Subpart J	61J-01	40 CFR 61 (NESHAP) SUBPART J DESIGN CAPACITY = SITE IS DESIGNED TO PRODUCE OR USE MORE THAN 1,000 MEGAGRAMS OF BENZENE PER YEAR ANY COMPONENT IN BENZENE SERVICE [NESHAP J] = THE FACILITY CONTAINS NO COMPONENT(S) IN BENZENE SERVICE
F12C05-01	40 CFR Part 61, Subpart V	61V-01	Vacuum Service = The fugitive unit contains components in vacuum service. VHAP Service = The fugitive unit contains no components in VHAP service.
F12C05-01	40 CFR Part 63, Subpart H	63H-01	EQUIPMENT TYPE = FUGITIVE UNIT DOES NOT CONTAIN EQUIPMENT LISTED IN 40 CFR § 63.160(A) WHICH IS OPERATED IN ORGANIC HAZARDOUS AIR POLLUTANT SERVICE
E12C035V	30 TAC Chapter 115, Vent Gas Controls	R5121-01	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C). Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.
E12C035V	30 TAC Chapter 115, Vent Gas Controls	R5121-02	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Smokeless flare Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.
E12C050V	30 TAC Chapter 115, Vent Gas Controls	R5121-01	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Smokeless flare Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.

Unit ID	Regulation	Index Number	Basis of Determination*
E12C100	40 CFR Part 63, Subpart G	63G-1	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Thermal incinerator.</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p>
E12C100	40 CFR Part 63, Subpart G	63G-2	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = No previous performance test was conducted.</p>
E12C110	40 CFR Part 63, Subpart G	63G-1	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Thermal incinerator.</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
E12C110	40 CFR Part 63, Subpart G	63G-2	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = No previous performance test was conducted.</p>
E12C111	40 CFR Part 63, Subpart G	63G-1	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Thermal incinerator.</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p>
E12C111	40 CFR Part 63, Subpart G	63G-2	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = No previous performance test was conducted.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
E12C112	40 CFR Part 63, Subpart G	63G-1	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Thermal incinerator.</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p>
E12C112	40 CFR Part 63, Subpart G	63G-2	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = No previous performance test was conducted.</p>
P12C105	40 CFR Part 63, Subpart G	63G-1	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Thermal incinerator.</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
P12C105	40 CFR Part 63, Subpart G	63G-2	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = No previous performance test was conducted.</p>
P12C106	40 CFR Part 63, Subpart G	63G-1	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Thermal incinerator.</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = A performance test was conducted for determining compliance with a regulation promulgated by the EPA using the same methods specified in Subpart G and either no process changes have been made, or the results reliably indicate compliance.</p>
P12C106	40 CFR Part 63, Subpart G	63G-2	<p>Alternate Monitoring Parameters = The EPA Administrator has not approved alternate monitoring parameters or alternate monitoring parameters are not used.</p> <p>Control Device = Flare</p> <p>Overlap = Title 40 CFR Part 60, Subpart NNN</p> <p>Group 1 = The process vent meets the definition of a Group 1 process vent.</p> <p>Continuous Monitoring = Complying with the continuous monitoring requirements of 40 CFR §§ 63.114, 63.117, and 63.118.</p> <p>Halogenated = Vent stream is not halogenated.</p> <p>By-pass Lines = The vent system contains by-pass lines that can divert the vent stream from the control device.</p> <p>Flow Indicator = A flow indicator is installed and operated at the entrance of the by-pass line.</p> <p>Performance Test = No previous performance test was conducted.</p>
P12GV2359	40 CFR Part 60, Subpart NNN	60NNN-01	Subpart NNN Chemicals = The distillation unit does not produce any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.
P12GV2533	40 CFR Part 60, Subpart NNN	60NNN-01	Subpart NNN Chemicals = The distillation unit does not produce any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.
P12GV2580	40 CFR Part 60, Subpart NNN	60NNN-01	Subpart NNN Chemicals = The distillation unit does not produce any chemical listed in 40 CFR § 60.667 as a product, co-product, by-product, or intermediate.

Unit ID	Regulation	Index Number	Basis of Determination*
E12C035	30 TAC Chapter 117, Subchapter B	R7201-01	Maximum Rated Capacity = MRC is less than 40 MMBtu/hr
E12C100	40 CFR Part 60, Subpart III	60III-01	Construction/Modification Date = On or before October 21, 1983.
E12C100	40 CFR Part 60, Subpart RRR	60RRR-01	Chemicals Listed in 40 CFR § 60.707 = The affected facility is not part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.
E12C110	40 CFR Part 60, Subpart III	60III-01	Construction/Modification Date = On or before October 21, 1983.
E12C110	40 CFR Part 60, Subpart RRR	60RRR-01	Chemicals Listed in 40 CFR § 60.707 = The affected facility is not part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.
E12C111	40 CFR Part 60, Subpart III	60III-01	Construction/Modification Date = On or before October 21, 1983.
E12C111	40 CFR Part 60, Subpart RRR	60RRR-01	Chemicals Listed in 40 CFR § 60.707 = The affected facility is not part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.
P12GE2510	40 CFR Part 60, Subpart RRR	60RRR-01	Chemicals Listed in 40 CFR § 60.707 = The affected facility is not part of a process unit that produces chemicals listed in 40 CFR § 60.707 as a product, co-product, by product, or intermediate.
PRO-ACIDS	40 CFR Part 63, Subpart F	63F-01	<p>Applicable Chemicals = The chemical manufacturing process unit manufactures, as a primary product, one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or 40 CFR § 63.100(b)(1)(ii).</p> <p>Intervening Cooling Fluid = There is no intervening cooling fluid containing less than 5 percent by weight of total HAPs listed in Table 4 of 40 CFR Part 63, Subpart F, between the process and cooling water.</p> <p>Table 2 HAP = The chemical manufacturing process unit uses as a reactant or manufactures, as a product or co-product, one or more of the organic hazardous air pollutants in Table 2.</p> <p>Table 4 HAP Content = The recirculating heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 4 of title 40 CFR Part 63, Subpart F.</p> <p>Alternate Means of Emission Limitation = No alternative means of emission limitation has been approved by the EPA Administrator to achieve a reduction in organic HAP emission or no alternate has been requested.</p> <p>NPDES Permit = The once-through heat exchange system is not subject to NPDES permit with an allowable discharge limit of 1 part per million or less above influent concentration or 10 percent or less above influent concentration.</p> <p>Meets 40 CFR 63.104(a)(4)(i)-(iv) = The once-through heat exchange system is not subject to an NPDES permit that meets 40 CFR § 63.104(a)(4)(i) - (iv).</p> <p>Heat Exchange System = A heat exchange system is utilized.</p> <p>Table 9 HAP Content = The once-through heat exchange system is not used exclusively to cool process fluids that contain less than 5 percent by weight of total HAPs listed in Table 9 of 40 CFR Part 63, Subpart G.</p> <p>Cooling Water Monitored = The cooling water is being monitored for the presence of one or more HAPs or other representative substances whose presence in cooling water indicates a leak.</p> <p>Cooling Water Pressure = The heat exchange system is not operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.</p>

* - The "unit attributes" or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 6355	Issuance Date: 08/24/2010
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sandblasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on June 10, 2015.

Site rating: 1.27 / Satisfactory Company rating: 0.56 / Satisfactory

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating?No

Permit reviewer notes: NA

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?No

2. Is a compliance plan and schedule included in the permit?No

Permit reviewer notes: NA

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes

OP-UA14 - Water Separator Attributes

OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes

OP-UA16 - Solvent Degreasing Machine Attributes

OP-UA17 - Distillation Unit Attributes

OP-UA18 - Surface Coating Operations Attributes

OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes